

October 25, 2002

Rules and Directives Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Comments on Draft Regulatory Guide DG-1099, *Anchoring Components and Structural Supports in Concrete*, (67 Fed. Reg. 47870)
Response to Request for Comments

PROJECT NUMBER: 689

The Nuclear Energy Institute (NEI)¹ has reviewed draft Regulatory Guide DG-1099, issued for public comment on July 22, 2002 and we offer these comments.

Regulatory Position 2 – Inspection of Anchor Systems

Regulatory Position 2 states that...“*anchors systems that are external to the concrete surface should be inspected regularly during the life of the structure.*”

The regulatory position also identifies a post-installed 6-step inspection program to verify the proper installation of post-installed anchors. Class 1, 2 and 3 pipe supports currently receive periodic inspection in accordance with the ASME Section XI Inservice Inspection Program. This inspection includes the base plate and any concrete anchorage. The USI A-46 (SQUG) program at many plants calls for inspection of anchorages for electrical and mechanical plant equipment, including pumps and valves. Both ASME Section XI and USI A-46 inspection programs have considered the six attributes for post installed anchor inspections, as listed in the draft guide. Therefore, we recommend that the first paragraph of Regulatory Position 2 be revised as follows to acknowledge the acceptability of existing programs in meeting the intent of this regulatory position:

“Anchors should be inspected to verify the proper installation of post-installed anchors. Inspection activities of other programs that meet the intent of this regulatory

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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“Anchors should be inspected to verify the proper installation of post-installed anchors. Inspection activities of other programs that meet the intent of this regulatory position (such as the ASME Section XI Inservice Inspection Program or the USI A-46 program) may be credited.”

Regulatory Position 7 - Use of anchors in masonry walls

Regulatory Position 7 provides a recommendation against the use of anchors in masonry walls, except for extremely low load applications. In locations where it is impossible to avoid the use of anchors, the guide recommends bolting through the block wall.

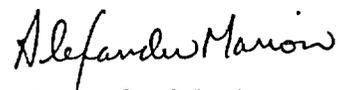
The guide needs to more clearly acknowledge that there can be instances where small, light loads can be supported by the use of small drilled-in anchors. In some instances, the use of through-wall bolting is inadvisable due to other considerations (e.g., compartment isolation).

We recommend that the following clarifying statement be added to Regulatory Position 7:

In instances where anchors in masonry walls are utilized, users should verify through appropriate means (e.g., pull test) that the supports are structurally acceptable.

Please direct questions to John Butler at 202-739-8108, jcb@nei.org, or me at 202-739-8080, am@nei.org.

Sincerely,



Alexander Marion

JCB/maa

c: H. L. Graves, U. S. Nuclear Regulatory Commission